

IRELL & MANELLA LLP
Andra Barmash Greene (123931)
agreene@irell.com
A. Matthew Ashley (198235)
mashley@irell.com
Justin N. Owens (254733)
jowens@irell.com
840 Newport Center Drive, Suite 400
Newport Beach, California 92660-6324
Telephone: (949) 760-0991
Facsimile: (949) 760-5200

Attorneys for Defendants

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO

JACOB SABATINO, individually, and on
behalf of all others similarly situated,

Plaintiffs,

vs.

UBER TECHNOLOGIES, INC., a Delaware
corporation; RASIER, LLC, a Delaware
limited liability company; RASIER-CA, LLC,
a Delaware limited liability company;
RASIER-DC, LLC, a Delaware limited
liability company; RASIER-PA, LLC, a
Delaware limited liability company; and DOES
1 to 25, inclusive,

Defendants.

Case No. 3:15-cv-00363-JST

**DECLARATION OF R. MICHAEL
CIANFRANI IN SUPPORT OF UBER'S
MOTION TO STAY PROCEEDINGS
PENDING ARBITRATION**

Date: May 21, 2015
Time: 2:00 p.m.
Judge: Hon. Jon S. Tigar
Place San Francisco Courthouse
Courtroom 9, 19th Floor
450 Golden Gate Ave.
San Francisco, CA 94102

1 I, R. Michael Cianfrani, hereby declare as follows:

2 1. I am over the age of 18 and I submit this declaration in support of Defendant's
3 Motion to Stay Proceedings Pending Arbitration. I have personal knowledge of each fact stated in
4 this declaration and, if called as a witness, I could and would competently and truthfully testify
5 thereto.

6 2. I am a Senior Litigation Paralegal at Uber Technologies, Inc. ("Uber"). I am
7 familiar with Uber's policies and procedures for maintaining in its business records the
8 agreements between Uber and riders, including the Uber Terms and Conditions. It is the custom
9 and practice of Uber to maintain in its business records copies of Uber's past and present Terms
10 and Conditions.

11 3. I accessed from Uber's business records the Terms and Conditions that were in
12 effect for U.S. riders on July 27, 2014. A true and correct copy of these Terms and Conditions is
13 attached hereto as **Exhibit A**.

14
15 I declare under penalty of perjury that the foregoing statements are true and correct.

16
17 Dated: March 23, 2015

By: 

R. Michael Cianfrani